

Southern and Southwestern Roundtables

Southern California's
Solid Waste Local
Enforcement Agencies

Cities:

Los Angeles

San Diego

Vernon

West Covina

Counties:

Imperial

Los Angeles

Orange

Riverside

Santa Barbara

San Bernardino

San Diego

Ventura

April 19, 2006

California Integrated Waste Management Board

P.O. Box 4025

Sacramento, CA

95812-4025

Attention: Mr. Robert Holmes

Subject: Permit Implementation Regulations (AB 1497)-Processing
Proposed Changes at Solid Waste Facility – Support for
Decision Tree Concept

Dear Mr. Holmes:

At the February 9, 2006 meeting of the Southern and Southwestern Roundtables a consensus was reached in support of the *decision tree* concept as described in 27 CCR, § 21665 *Processing Proposed Changes at Solid Waste Facility* of the proposed regulation package. Additionally, the majority of those attending the meeting were not in support of the Alternative Minor Change Lists 1 and 2 and Alternative 3 Significant Change list proposed in § 21620.

The Roundtables reached consensus regarding the decision tree process because it clarifies when a proposed change is a significant change or otherwise. It is also transparent and applies well to the diversity of communities and environments in California while allowing for local discretion without assuming a one-size-fits-all definition of *significant change*.

The primary concern raised at the Roundtables regarding the three *Change in Operation* lists, as proposed in the draft regulations, was that they would limit an LEA's discretion and possibly lock operators into a position that would limit their permitting options. Of the three Lists, those attending the meeting would support Alternative Minor Change Lists 1, if necessary. However, there was little support for the Alternative 3 Significant Change list.

We thank you for the opportunity to provide comments on the above proposed regulations and look forward to your response through the rulemaking process.

Sincerely,



Patricia Henshaw, Chair
Southern Roundtable



Leonard Grossberg, Chair
Southwestern Roundtable

cc: Ben Gale, Chair, California Conference of Environmental Health
Directors-Solid Waste Policy Committee
Bill Prinz, Chair, Enforcement Advisory Council
Howard Levinson, Deputy Director, CIWMB
Mark de Bie, Branch Manager, Permitting and Inspection, CIWMB